The Honorable Benjamin H. Settle

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

11 UNITED STATES OF AMERICA,   NO. CR19-258RAJ

12   Plaintiff,

13   v.   **DECLARATION OF SPECIAL AGENT
                                                 ANDREA L. DESANTO**
14 ABIDEMI RUFAI,

15   Defendant.

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18   I, Andrea L. DeSanto, hereby declare as follows:

19   1.   I have served as a Special Agent with the Federal Bureau Investigation

20 since 2006. I am the case agent principally responsible for this investigation. I am

21 currently assigned to the Seattle Field Office. My primary duties include investigating

22 violations of federal law, including but not limited to, Title 18, United States Code,

23 Sections 1343 (wire fraud), 1028A (aggravated identity Theft), 1956 (money laundering),

24 1957 (transactional money laundering), and conspiracy to commit these offenses. I

25 previously worked on the Cyber squad, where I primarily investigated computer

26 intrusions and other cybercrimes. My experience as an FBI agent includes the

27 investigation of cases involving the use of computers and the Internet to commit crimes.

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1 In addition to my experience with cybercrime investigations, I also have experience with
2 financial investigations.

3   2.   My investigation determined that defendant Abidemi Rufai was the
4 operator of an email account with the address sandytangy58@gmail.com. As charged in
5 the Indictment and admitted in the Plea Agreement in this matter, my investigation
6 established that Mr. Rufai used the sandytangy58@gmail.com email account to submit
7 fraudulent claims for unemployment benefits using the stolen identities of other persons.

8   3.   The United States Department of Labor Office of the Inspector General
9 (DOL-OIG) maintains a database known as the OIG Warehouse and Learning System
10 (OWLS). OWLS contains the data associated with the unemployment claims submitted to
11 each of the 54 State Workforce Agencies (SWAs) that administer federally-funded
12 unemployment programs. The OWLS database allows DOL-OIG to run searches and
13 retrieve claims data for individual claims based on a host of parameters. For example,
14 DOL-OIG can retrieve all claims nationwide that were filed using a certain email address
15 or that requested that benefits be deposited to a certain banks account. I have requested
16 data from the OWLS service dozens of times in my investigation and have found the data
17 to be accurate and reliable.

18   4.   On May 12, 2021, DOL-OIG prepared an OWLS analysis identifying all
19 claims filed using the email address sandytangy58@gmail.com. A true and correct copy
20 of the DOL-OIG memorandum summarizing this analysis is attached hereto as Exhibit A.
21 As reflected on Exhibit A, sandytangy58@gmail.com was used to file 136 claims, which
22 resulted in payments from three SWAs in the total amount of $357,951.

23   5.   I also discovered during the course of my investigation that Mr. Rufai used
24 other email accounts to submit fraudulent unemployment claims. I used four criteria to
25 identify other accounts used by Mr. Rufai. First, I identified email accounts that were
26 linked by cookies with the sandytangy58@gmail.com account. If two accounts are linked
27 by cookies, this means that the same device (such as the same iPhone or iPad) was used
28 to access both accounts. In my training and experience, the fact that two accounts are

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1 linked by cookies is very strong evidence that the accounts are operated by the same

2 person, or perhaps a close friend or family member. I obtained a list from Google of

3 email accounts linked by cookies to the sandytangy58@gmail.com account. I identified

4 34 different Gmail accounts that were linked to sandytangy58@gmail.com by cookies.

5   6.   Second, I identified email accounts that were accessed using an IP address

6 that was also used to access sandytangy58@gmail.com. An internet protocol address, or

7 "IP address," is a unique address assigned to a computer network or computer that

8 communicates over the internet. If two email accounts are accessed using the same IP

9 address at approximately the same time, this tends to show that the accounts are being

10 used by the same person, or two people using the same network. In this case, I requested

11 that DOL-OIG run an OWLS search to identify claims that were submitted using the

12 same IP address used to submit a fraudulent sandytangy58@gmail.com claim. OWLS

13 identified 28 email accounts that were used to submit claims using the same IP address

14 used to submit a sandytangy58@gmail.com claim.

15   7.   Third, I identified email addresses that were stored within the

16 sandytangy58@gmail.com account, which I obtained through a search warrant. The

17 sandytangy58@gmail.com account contained numerous lists of stolen personal

18 identifying information (such as a person's name, date of birth, and Social Security

19 number). Often those lists of information also included an email address, which was

20 sometimes a variation of the sandytangy58@gmail.com address and sometimes a

21 different email address.

22   8.   Finally, I identified email accounts that submitted claims using the same

23 destination bank account as claims submitted using the sandytangy58@gmail.com. That

24 is, I identified email accounts where the claimant requested that benefits be paid into a

25 bank account that was also used to receive benefits for a fraudulent claim submitted using

26 the sandytangy58@gmail.com account. To identify the accounts, I submitted to DOL-

27 OIG a list of bank accounts into which the fraudulent sandytangy58@gmail.com claims

28 had been deposited. I requested that DOL-OIG run an OWLS search to identify other

1 claims that used these same bank accounts as destination accounts to receive benefit

2 payments. DOL-OIG provided me with the claims data for these claims, which included

3 the email accounts associated with the claims. I identified 16 email accounts that

4 submitted claims using a common destination bank account with a

5 sandytangy58@gmail.claim.

6   9.   Based on the investigation described above, I generated list of email

7 accounts that met at least two of the following criteria: (a) the accounts were linked by

8 cookies as discussed above on Paragraph 5; (b) the account shared a common IP address

9 with sandytangy58@gmail.com, as discussed in Paragraph 6; or (c) the account was

10 referenced in a document maintained in the sandytangy58@gmail.com email account, as

11 discussed in Paragraph 7. Because each of these three criteria standing alone is strongly

12 indicative that the account was operated by Rufai or a co-conspirator, I concluded that it

13 was reasonably certain that, if at least *two* criteria were satisfied, the account was

14 operated by Rufai or a co-conspirator. In addition, I added to this list the 16 accounts that

15 shared a common destination bank account with a fraudulent sandytangy58@gmail.com

16 claim. I believed that this criterion, standing on its own, was sufficient to establish that

17 the claim was filed by Rufai or a co-conspirator because the odds of two claims being

18 directed to the same account by coincidence are astronomically low. Exhibit B is a true

19 and correct copy of a list I prepared identifying the additional email accounts that I

20 believe, based on this analysis, were operated by Rufai or a co-conspirator.

21   10.   I then submitted the email accounts listed on Exhibit B to DOL-OIG. I

22 requested that DOL-OIG query the OWLS database for all fraudulent claims submitted

23 using these email accounts. A true and correct copy of the DOL-OIG memorandum

24 summarizing the results is attached as Exhibit C. As reflected in the report, the database

25 indicated that these email addresses were used to submit a total of 89 claims, resulting in

26 a total payout of $128,931.

27   I declare under penalty of perjury under the laws of the State of Washington that

28 the foregoing is true and correct.

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1   Dated: September 13, 2022.

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ANDREA L. DESANTO
Special Agent, Federal Bureau of Investigation

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EXHIBIT A

U.S. Department of Labor   Office of Inspector General
Office of Investigations Labor Racketeering and Fraud
200 Constitution Avenue, Suite S - 5022
Washington, D.C. 20210

May 12, 2021

REPORT FOR: Seth Wilkinson, Assistant United States Attorney

FROM: Timothy Eagle, Branch Chief of Data Science

CASE NAME: Washington Pandemic UI & ID Theft

CASE NUMBER: I209000022

Unemployment Insurance Claim Email Analysis Report

Overview & Request

On May 12, 2021, Assistant United States Attorney Seth Wilkinson (AUSA Wilkinson) requested various information about Unemployment Insurance (UI) Claims filed with the email address SANDYTANGY58@GMAIL.COM. Specifically, AUSA Wilkinson requested the number of claims filed with this email, the number of states, and the total amount of UI Benefits paid.

Methodology

The OIG queried the OIG Warehouse and Learning System (OWLS) for all UI claims filed using the email address SANDYTANGY58@GMAIL.COM . The OIG then extracted relevant claims data and summarized to find the needed information.

Data Analyzed

Pursuant to its subpoena authority under the Inspector General Act of 1978, as amended, the U.S. Department of Labor (DOL) Office of Inspector General (OIG) has obtained unemployment insurance (UI) claim and wage information from all 54 state workforce agencies (SWAs). Although SWAs administer their own separate UI benefit programs, they do so under a framework of federal regulations overseen by DOL. The OIG investigates fraud, waste, and abuse in DOL programs and operations, including federal-state UI programs.

Since 2020, the OIG has received from SWAs by subpoena and data sharing agreements certain data elements related to UI claims for regular and enhanced pandemic relief UI benefits. In general, the SWAs produced datasets to DOL-OIG through encrypted transfer, and OIG data scientists loaded datasets into the OIG's secure data warehouse. In addition to bulk data transfers, certain SWAs equipped OIG special agents with direct read-only access to their UI claims processing portals to aid the SWAs with fraud detection

Once data is received, OIG loads the raw data into a read-only database, taking measures to ensure data remains consistent with SWA datasets. If the OIG notices minor anomalies with the data, OIG data scientists contact the SWA to ensure receipt of complete data elements, and the

SWA retransmits their data if necessary. DOL-OIG then processes and summarizes the SWA data to a claimant-level for each SWA and combines the data into a nation-wide UI database. OIG Data Scientists (OIG-DSs) and Special Agents (SAs) with a need-to-access the application are then able to access this data in a read only manner to do commonality testing on various fraud indicators, as well as cross match it against other data sets. By accessing the information in read-only format, OIG prevents inadvertent errors and ensures the integrity of all SWAs' data. This activity furthers active investigations and it also generates new leads for OIG and its federal and state law enforcement partners.

Analysis/Findings

The OIG found the following information:

Filing State	Number of Claims	Total Benefits Paid
HI	1	
ME	2	
MI	18	$14,980.00
MO	1	
MT	2	
NY	4	$2,208.00
OH	1	
PA	2	
WA	102	$350,763.00
WI	1	
WY	2	
Grand Total	**136**	**$367,951.00**

Table 1 - UI Claims for SANDYTANGY58@gmail.com

SANDYTANGY58@GMAIL.COM was used to file 136 claims in 11 different states. This email address was only paid benefits in three states, Michigan, New York and Washington. It was determined this email received $367,951 in UI benefits. These claims filed between April 25, 2020 and October 3, 2020.

Please do not hesitate to contact us if you have any questions about this analysis.

Attachments:

- SANDYTANGY58_20210521.xlsx – Spreadsheets showing RAW claims data from OWLS and analysis pivot table
- Affidavit Language Excerpt – Language that can be used in affidavits and other documents to describe the UI data in DOL-OIG's possession.

EXHIBIT B

U.S. Department of Labor   Office of Inspector General
Office of Investigations Labor Racketeering and Fraud
200 Constitution Avenue, Suite S - 5022
Washington, D.C. 20210

January 25, 2024

REPORT FOR: David Yip

FROM: Kathryn Bolton, Data Science Fellow

CASE NAME: Washington Pandemic UI & ID Theft

CASE NUMBER: I209000022

Unemployment Insurance Claim Email Analysis Report

Overview & Request

On January 13, 2022, Special Agent David Yip requested various information about Unemployment Insurance (UI) Claims filed with a given list of email addresses, and asked for a breakdown analysis of the resulting matches.

Methodology

The OIG queried the OIG Warehouse and Learning System (OWLS) for all UI claims filed using any of the email addresses provided. The OIG then extracted relevant claims data and summarized to find the needed information.

Data Analyzed

Pursuant to its subpoena authority under the Inspector General Act of 1978, as amended, the U.S. Department of Labor (DOL) Office of Inspector General (OIG) has obtained unemployment insurance (UI) claim and wage information from all 54 state workforce agencies (SWAs). Although SWAs administer their own separate UI benefit programs, they do so under a framework of federal regulations overseen by DOL. The OIG investigates fraud, waste, and abuse in DOL programs and operations, including federal-state UI programs.

Since 2020, the OIG has received from SWAs by subpoena and data sharing agreements certain data elements related to UI claims for regular and enhanced pandemic relief UI benefits. In general, the SWAs produced datasets to DOL-OIG through encrypted transfer, and OIG data scientists loaded datasets into the OIG's secure data warehouse. In addition to bulk data transfers, certain SWAs equipped OIG special agents with direct read-only access to their UI claims processing portals to aid the SWAs with fraud detection

Once data is received, OIG loads the raw data into a read-only database, taking measures to ensure data remains consistent with SWA datasets. If the OIG notices minor anomalies with the data, OIG data scientists contact the SWA to ensure receipt of complete data elements, and the SWA retransmits their data if necessary. DOL-OIG then processes and summarizes the SWA

data to a claimant-level for each SWA and combines the data into a nation-wide UI database. OIG Data Scientists (OIG-DSs) and Special Agents (SAs) with a need-to-access the application are then able to access this data in a read only manner to do commonality testing on various fraud indicators, as well as cross match it against other data sets. By accessing the information in read-only format, OIG prevents inadvertent errors and ensures the integrity of all SWAs' data. This activity furthers active investigations and it also generates new leads for OIG and its federal and state law enforcement partners.

Analysis/Findings

The OIG found the following information, sorted by the benefit sum:

Email	Count of claims	Sum of benefit paid
RICKYGARYY7@GMAIL.COM	**8**	**$ 21,482**
MA	1	
MN	2	
NY	4	$ 18,350
RI	1	$ 3,132
VABEH23048@AGILEKZ.COM	**2**	**$ 8,756**
AZ	2	$ 8,756
RISSERSPOULTRY@BIRDLOVER.COM	**1**	**$ 8,420**
MI	1	$ 8,420
TAXFORCPA@GMAIL.COM	**2**	**$ 8,205**
ME	1	$ 8,205
WA	1	
LAURIBAIRD196@GMAIL.COM	**1**	**$ 7,696**
MI	1	$ 7,696
STATEWORKER909@MAIL.COM	**5**	**$ 6,995**
MN	4	$ 5,243
NY	1	$ 1,752
AMICKFARMS@BIRDLOVER.COM	**1**	**$ 6,560**
MI	1	$ 6,560
NELSONFARRMSY@GMAIL.COM	**3**	**$ 6,560**
ME	1	
MI	1	$ 6,560
WA	1	
SHAWNPERIO1980@HOTMAIL.COM	**1**	**$ 5,970**
AZ	1	$ 5,970
CHARISMALEADER03@MAIL.COM	**3**	**$ 4,888**
MN	2	$ 2,680
NY	1	$ 2,208
STATEWORKER90@MAIL.COM	**3**	**$ 4,639**
MN	2	$ 2,431
NY	1	$ 2,208

COLEMANAGRIC16@GMAIL.COM	**2**	**$**	**3,548**
MN	1	$	1,340
NY	1	$	2,208
CENTURIONPOULTRY04@GMAIL.COM	**1**	**$**	**2,208**
NY	1	$	2,208
AGRICULTUREATLANTIC@GMAIL.COM	**2**	**$**	**2,208**
MN	1		
NY	1	$	2,208
BRAINMASSEY@MAIL.COM	**5**	**$**	**2,208**
AZ	1		
HI	1		
MI	1		
NY	1	$	2,208
WV	1		
ZORNSPOULTRYFARMS@BIRDLOVER.COM	**3**	**$**	**2,208**
AZ	1		
MI	1		
NY	1	$	2,208
GERBERSPOULTRY@GMAIL.COM	**1**	**$**	**2,208**
NY	1	$	2,208
OLIVERASSOCPA@GMAIL.COM	**3**	**$**	**2,208**
MA	1		
NY	1	$	2,208
WA	1		
TENTHYLICENSEY@MAIL.COM	**4**	**$**	**2,208**
AZ	2		
MI	1		
NY	1	$	2,208
REDSTATEWATE@MAIL.COM	**1**	**$**	**2,208**
NY	1	$	2,208
JEFFWATTERS900@MAIL.COM	**1**	**$**	**2,208**
NY	1	$	2,208
CB.KIRSCHNERR@GMAIL.COM	**2**	**$**	**2,208**
NY	1	$	2,208
WA	1		
NINTHEYLICENSE@MAIL.COM	**1**	**$**	**2,208**
NY	1	$	2,208
RSHEP2002@AOL.COM	**3**	**$**	**2,163**
MN	1	$	1,273
NY	1	$	890
WI	1		

DOCTORSDUTY07@MAIL.COM	**1**	**$**	**2,018**
NY	1	$	2,018
ROBOTOMASSEY@MAIL.COM	**1**	**$**	**1,546**
NY	1	$	1,546
SENATESUNNEY@MAIL.COM	**3**	**$**	**1,104**
MI	1		
NY	1	$	1,104
WV	1		
SWEDENCONSERVET@MAIL.COM	**1**	**$**	**1,104**
NY	1	$	1,104
ROBOTOSUNNEY@MAIL.COM	**4**	**$**	**1,104**
AZ	1		
MI	1		
NY	1	$	1,104
WV	1		
WILLYCIEP@GMAIL.COM	**1**	**$**	**1,104**
NY	1	$	1,104
WESLEYTHOMM@GMAIL.COM	**1**	**$**	**782**
NY	1	$	782
NELSONSFAMILYFARMS@GMAIL.COM	**1**		
ME	1		
RMAIZEY09@GMAIL.COM	**1**		
AZ	1		
WATKINSPOULTRYMERCHANTS@BIRDLOVER.COM	**1**		
MI	1		
JCORINA817@GMAIL.COM	**1**		
AZ	1		
MARKLUTHY1969@GMAIL.COM	**1**		
AZ	1		
ANNEZLEMM@GMAIL.COM	**2**		
AZ	1		
MI	1		
FIFTHLICENSEY@MAIL.COM	**2**		
AZ	1		
MI	1		
VANCEB916@GMAIL.COM	**1**		
AZ	1		
JUMPERSUNNEY@MAIL.COM	**2**		
AZ	1		
MI	1		
JESSICA140JOSEPH@GMAIL.COM	**2**		

CA	1		
MA	1		
DALESDAU@MAIL.COM	**1**		
MT	1		
JOHNSANDYTANGY@GMAIL.COM	**1**		
WI	1		
ASHLEYKEMMEY@GMAIL.COM	**1**		
WI	1		
SIGMANLICENSE@MAIL.COM	**1**		
MI	1		
Grand Total	**89**	**$**	**128,932**

Please do not hesitate to contact us if you have any questions about this analysis.

Attachments:

- 22-168_UImatch_01.14.22.xlsx – Spreadsheets showing RAW claims data from OWLS and analysis pivot table

EXHIBIT C

CLMNT_EMAIL	ACCOUNTS LINKED BY COOKIES' TO SANDYTANG...	COMMON DESTINATION ACCOUNT	COMMON IP ADDRESS	REFERENCED IN SW RETURN
1 LAURIBAIRD196()GMAIL.COM	green	green	green	green
2 NELSONFARRMSY()GMAIL.COM	green	green	green	green
3 NELSONSFAMILYFARMS()GMAIL.COM	green	green	green	green
4 AGRICULTUREATLANTIC()GMAIL.COM	green		green	green
5 ANNEZLEMM()GMAIL.COM	green		green	green
6 MARKLUTHY1969()GMAIL.COM	green		green	green
7 RMAIZEY09()GMAIL.COM	green		green	green
8 TAXFORCPA()GMAIL.COM	green		green	green
9 VANCEB916()GMAIL.COM	green		green	------
10 AMICKFARMS()BIRDLOVER.COM		green	green	green
11 RISSERSPOULTRY()BIRDLOVER.COM		green	green	green
12 ROBOTOMASSEY()MAIL.COM		green	green	green
13 ROBOTOSUNNEY()MAIL.COM		green	green	green
14 SENATESUNNEY()MAIL.COM		green	green	green
15 FIFTHLICENSEY()MAIL.COM		green	green	------
16 BRAINMASSEY()MAIL.COM			green	green
17 CHARISMALEADER03()MAIL.COM			green	green
18 DOCTORSDUTY07()MAIL.COM			green	green
19 JEFFWATTERS900()MAIL.COM			green	green
20 JUMPERSUNNEY()MAIL.COM			green	green
21 NINTHEYLICENSE()MAIL.COM			green	green
22 REDSTATEWATE()MAIL.COM			green	green
23 RSHEP2002()AOL.COM			green	green
24 STATEWORKER90()MAIL.COM			green	green
25 STATEWORKER909()MAIL.COM			green	green
26 SWEDENCONSERVET()MAIL.COM			green	green
27 TENTHYLICENSEY()MAIL.COM			green	green
28 ZORNSPOULTRYFARMS()BIRDLOVER.COM			green	green
29 BRAINHEAYLEY()MAIL.COM			green	------
30 JKONNEY02()MAIL.COM			green	------
31 JWATTERRY()MAIL.COM			green	------
32 WATKINSPOULTRYMERCHANTS()BIRDLOVER.COM			green	------
33 DALESDAU()MAIL.COM		green		------
34 JCORINA817()GMAIL.COM		green		------
35 JESSICA140JOSEPH()GMAIL.COM		green		------
36 RICKYGARYY7()GMAIL.COM		green		------
37 SHAWNPERIO1980()HOTMAIL.COM		green		------
38 SIGMANLICENSE()MAIL.COM		green		------
39 VABEH23048()AGILEKZ.COM		green		------
40 amanda.grist()ommsco.co.uk	green			green
41 ashleykemmey()gmail.com	green			green
42 cb.kirschnerr()gmail.com	green			green
43 centurionpoultry04()gmail.com	green			green
44 colemanagric16()gmail.com	green			green
45 dfredrichey()gmail.com	green			green
46 gerberspoultry()gmail.com	green			green
47 hannah.starling()blakeeturner.com	green			------
48 jackiesulich75()gmail.com	green			green
49 janebruehlss()gmail.com	green			green
50 johnsandytangy()gmail.com	green			green
51 jralphy009()gmail.com	green			green
52 kauffmanfarms258()gmail.com	green			green
53 kbailley909()gmail.com	green			green
54 kdunney90()gmail.com	green			------
55 lauribaird1960()gmail.com	green			------
56 mwasshey98()gmail.com	green			green
57 oliverassocpa()gmail.com	green			green
58 rhammany89()gmail.com	green			green

59	richard.green()ommsco.co.uk				
60	stboggman()gmail.com				
61	tkiernnan()gmail.com				
62	wesleythomm()gmail.com				
63	willowtreepoultryfarm()gmail.com				
64	willyciep()gmail.com				